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OCT 22 2012

**WERE ENDORSED**

October 22, 2012

**VIA FAX**

Honorable Magistrate Judge Kevin Fox  
Daniel Patrick Moynihan  
U.S. Courthouse, 500 Pearl Street  
New York, N.Y. 10007-1312

Re: North Jersey Media Group Inc. v. John Does No. 1-5  
d/b/a stoopidhousewives.com - 12 Civ. 6152 (VM)

Dear Magistrate Judge Fox:

We represent defendant stoopidhousewives.com. Further to Your Honor's Memo Endorsed Order of October 17, 2012, we submitted today to the Court Clerk the original signed declaration of our client under seal. As the Court is aware, the declaration was submitted in further support of our client's motion to proceed in this litigation under the fictitious name stoopidhousewives.com and for a Protective Order (the "Pending Motion"). Since opposing counsel, William Dunnegan, is bound by the Stipulation and Order entered by the Court on September 28, 2012 ("Stipulated Order") to hold our client's name on an "attorney's eyes only basis" until the Court orders otherwise, we have also provided him with a copy by e-mail.

**Request for Extension of Time**

As stated in the Stipulated Order, defendant's counsel accepted service of the complaint effective upon the signing of the Stipulated Order, without prejudice to defendant's right to assert jurisdictional defenses, including lack of personal jurisdiction, improper venue, and forum *non-conveniens*, other than inadequacy of service of process. The due date for the response to the complaint is thus today October 22, 2012. Our client Stoopidhousewives.com wishes to make a 12(b)6 motion to dismiss asserting, *inter alia*, lack of personal jurisdiction. In that regard, we respectfully request an extension of time to respond to the complaint so we can adequately prepare such a motion. Since the Court's ruling on the Pending Motion will inform us on the nature and scope of the motion we should file to best protect our client's interests of proceeding without disclosing our client's personal name and identifying details, we respectfully request that the Court set the due date for our response to be 20 days from its ruling on the Present Motion. This is defendant's first request for an extension of time to respond to the complaint.

10/25/12  
Application granted.

so ORDERED:

Kevin Nathaniel Fox

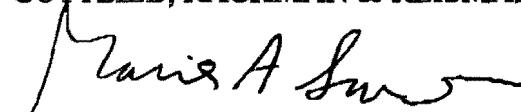
KEVIN NATHANIEL FOX, U.S.M.J.

Honorable Magistrate Judge Kevin Fox  
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Counsel for plaintiff is not agreeable to our request to extend the time to respond to the complaint. Counsel stated that: "Even though you officially accepted service in September, we have been working on the case since August" and that "We don't think that the pending motion should impact your ability to answer or the parties' ability to start discovery."

Respectfully,

GOTTLIEB, RACKMAN & REISMAN, P.C.

  
Maria A. Savio

MAS/mr  
cc: William Dunnegan, Esq. (via fax and e-mail)  
Ella Aiken, Esq. (via fax and e-mail)  
Anthony W. Brooks, Esq. (via e-mail)